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12	Triounur Triurugement, Inc.	
13	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
14		
15	UNITED STATES OF AMERICA, for the use and benefit of SUSTAINABLE MODULAR	Case No. 2:20-cv-00790- GMN-NJK
16	MANAGEMENT, INC., a Texas corporation, Plaintiff,	
17	vs.	AGREED MOTION TO DISMISS
18	JE DUNN CONSTRUCTION COMPANY;	WITH PREJUDICE
19	FEDERAL INSURANCE COMPANY; HARTFORD FIRE INSURANCE COMPANY;	
20	TRAVELERS CASUALTY AND SURETY	
21	COMPANY OF AMERICA; DOE Individuals I-X and DOE Entities I-X, inclusive,	
22	Defendants.	
23	JE DUNN CONSTRUCTION COMPANY Counter-Plaintiff	
24	vs.	
25	SUSTAINABLE MODULAR MANAGEMENT,	
26	INC., a Texas corporation, Counter-Defendant.	
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## Case 2:20-cv-00790-GMN-NJK Document 179 Filed 07/14/25 Page 2 of 5

1 Plaintiff, Sustainable Modular Management, Inc. ("Plaintiff"), and Defendants, JE Dunn 2 Construction Company, Federal Insurance Company, Hartford Fire Insurance Company, Travelers 3 Casualty and Surety Company of America, DOE Individuals I-X and Does Entities I-X, (the "Defendants") 4 (collectively referred to as the "Parties"), submit their Agreed Motion to Dismiss with Prejudice (the 5 "Motion"), and respectfully show the Court as follows: 6 7 Plaintiff and Defendants have settled all of their respective claims arising out of and/or relating to 8 the above-captioned case, the allegations and causes of action stated in the pleadings, and the 9 circumstances that gave rise to this action. 10 The Parties therefore respectfully request this Court grant this Motion and dismiss all claims and 11 causes of action that Plaintiff and Defendants brought or could have brought against each other in this 12 13 lawsuit, with prejudice to the refiling of same. 14 DATED July 11, 2025. 15 16 HARTWELL THALACKER, LTD LEWIS ROCA ROTHGERBER CHRISTIE LLP 17 18 By: /s/ Michael S. Alfred By: /s/ Robert Roos Doreen Spears Hartwell, SBN 7525 Robert F. Roos (Pro Hac Vice) 19 Laura J. Thalacker, SBN 5252 201 East Washington Street, Suite 1200 HARTWELL THALACKER, LTD Phoenix, Arizona 85004-2595 20 11920 Southern Highlands Pkwy 21 Suite 201 Dale Kotchka-Alanes, Bar No. 13168 3993 Howard Hughes Pkwy, Suite 600 Las Vegas, Nevada 89141 22 Las Vegas, NV 89169-5996 VerisLaw, PLLC 23 Michael S. Alfred Attorneys for Defendant/Counterclaimant 24 JE Dunn Construction Company and Surety Defendants (admitted pro hac vice) 4843 Colleyville Blvd., Suite 251-391 25 Colleyville, Texas 76034 26 Attorneys for Plaintiff 27

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## CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing Procedures, I certify that on July 11, 2025, that the above MOTION TO RESET IN-PERSON PRETRIAL CONFERENCE was served via electronic service on all counsel of record.

/s/ Michael S. Alfred
Michael S. Alfred

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6	and	
7 8 9 10	Michael Alfred (pro hac vice) VERISLAW, PLLC 4843 Colleyville Blvd., Suite 251-391 Colleyville, Texas 76034 Phone: (817) 678-4121 Fax: (512) 717-7230 Email: malfred@verislaw.net	
11 12	Attorneys for Plaintiff Sustainable Modular Management, Inc.	
13	UNITED STATES DISTRICT COURT	
14	DISTRICT OF NEVADA	
15 16	UNITED STATES OF AMERICA, for the use and benefit of SUSTAINABLE MODULAR MANAGEMENT, INC., a Texas corporation, <i>Plaintiff</i> ,	Case No. 2:20-cv-00790- GMN-NJK
17 18 19 20 21 22 23 24	VS.  JE DUNN CONSTRUCTION COMPANY; FEDERAL INSURANCE COMPANY; HARTFORD FIRE INSURANCE COMPANY; TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA; DOE Individuals I-X and DOE Entities I-X, inclusive, Defendants.  JE DUNN CONSTRUCTION COMPANY Counter-Plaintiff vs.	ORDER GRANTING AGREED MOTION TO DISMISS WITH PREJUDICE
25 26 27 28	SUSTAINABLE MODULAR MANAGEMENT, INC., a Texas corporation, Counter-Defendant.	

Order – Page 1

## Case 2:20-cv-00790-GMN-NJK Document 179 Filed 07/14/25 Page 5 of 5

1 After having considered the Agreed Motion to Dismiss with Prejudice [Dkt.178] (the "Motion") 2 filed by Plaintiff, Sustainable Modular Management, Inc. ("Plaintiff"), and Defendants, JE Dunn 3 Construction Company, Federal Insurance Company, Hartford Fire Insurance Company, Travelers 4 Casualty and Surety Company of America, DOE Individuals I-X and Does Entities I-X, (the 5 "Defendants"), the Court finds that the Motion should granted. 6 7 Therefore, the Court ORDERS that this lawsuit and all claims asserted or that could have been 8 asserted by and between Plaintiffs and Defendants be, and are hereby, dismissed with prejudice to the re-9 filing of same, with each party bearing its own costs and attorney's fees. 10 Dated: July 14, 2025. 11 12 13 Gloria M. Navarro, District Judge 14 UNITED STATES DISTRICT COURT 15 AGREED: 16

HARTWELL THALACKER, LTD

By: /s/ Michael S. Alfred

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